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13 *and MNE Services, Inc. (dba Tribal Financial*
14 *Services, Ameriloan, UnitedCashLoans,*
15 *USFastCash)*

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**UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA**

FEDERAL TRADE COMMISSION,

Plaintiff,

v.

AMG SERVICES, INC., *ET AL.*,

Defendants, and

PARK 269 LLC, *ET AL.*,

Relief Defendants.

Case No.: 2:12-CV-536-GMN-(VCF)

**MOTION TO FILE DOCUMENTS
UNDER SEAL**

1 Pursuant to Local Rule 10-5(b) and the Amended Confidentiality and Protective
2 Order in this case (ECF No. 308), AMG Services, Inc. moves to file under seal the bank
3 statements of Kellye Sliger, attached as Exhibit H to AMG's March 27, 2013 *Motion to*
4 *Compel Discovery Responses and Unredacted Documents from the FTC* ("Motion to
5 Compel") (ECF No. 360) and the bank statements of Jennifer Adelman, Walter Archer, Betty
6 Turner, and Lejone Morris, attached as Exhibit G to AMG's Motion to Compel. AMG
7 further moves to file a version of its Motion to Compel that redacts confidential information.

8 The reasons for this motion are as follows:

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10 1. On January 15, 2013, the FTC produced documents containing the redacted bank
11 statements of Jennifer Adelman, Walter Archer, Betty Turner, and Lejone Morris. The FTC
12 designated some of these statements "Confidential" (Bates ranges FTC-CLK-3813-14, FTC-
13 CLK-4009-11, FTC-CLK-4017, FTC-CLK-4022-25, FTC-CLK-4551-50, FTC-CLK-5075,
14 FTC-CLK-5077). Other documents containing the same bank statements were not marked
15 "Confidential." (Bates ranges FTC-CLK-3752-55, FTC-CLK-3763-66, FTC-CLK-3774-82,
16 FTC-CLK-3784-87, FTC-CLK-3795-98, FTC-CLK-3806-12, CLK 3984-4004, FTC-CLK-
17 4447-4503, FTC-CLK-5085-5111.)

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19 2. Also on January 15, 2013, the FTC produced the bank statements of declarant
20 Kellye Sliger with the bank line items unredacted (Bates range FTC-CLK-4177-89). These
21 statements were marked "Confidential."

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23 3. On March 27, 2013, AMG filed its Motion to Compel. Exhibit G to the Motion to
24 Compel contains samples of Ms. Adelman's, Mr. Archer's, Ms. Turner's, and Ms. Morris's bank
25 statements. Some of these statements had been marked "Confidential" by the FTC; others had
26 not. Exhibit H to the Motion to Compel contains Ms. Sliger's bank statements, all of which are
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1 marked “Confidential.” The Motion to Compel also showed specific line items from Ms.
2 Sliger’s bank statement.

3 4. The parties’ Amended Confidentiality and Protective Order permits parties to
4 “designate material as ‘Confidential’” if it contains confidential financial information. (ECF No.
5 308 at 1–2.) A party who files information designated “Confidential” with the Court must “seek
6 to file the Confidential Information under seal.” (*Id.* at 5.)

7 8 5. On March 26, 2013, the parties conferred about Ms. Sliger’s bank statement, and
9 the FTC requested that it be filed under seal. (Meltzer Decl. ¶ 10, ECF No. 360-1.) Based on
10 this request, AMG also redacted the portion of its Motion to Compel that quotes Ms. Sliger’s
11 bank statement.

12 Accordingly, based the FTC’s requests and the controlling protective order in this
13 case, AMG respectfully asks the Court to grant its motion to file Exhibits G and H under
14 seal. AMG also asks the Court to permit it to redact from its Motion to Compel quoted
15 information taken from Exhibit H.
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1 Dated: March 27, 2013

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3 /s/ Matthew S. Meltzer

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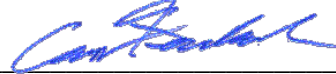
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12 *and MNE Services, Inc. (dba Tribal Financial*

13 *Services, Ameriloan, UnitedCashLoans,*

14 *USFastCash)*

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IT IS SO ORDERED:



UNITED STATES MAGISTRATE JUDGE

DATED: 4-4-2013

CERTIFICATE OF SERVICE

Pursuant to Federal Rule of Civil Procedure 5(b), I hereby certify that on the 27th day of March, 2013, I submitted the foregoing *Motion to File Documents Under Seal* electronically for filing and service with the United States District Court of Nevada. Service of the foregoing document shall be made to all counsel of record via electronic case filing.

/s/ Bradley H. Weidenhammer